

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

**In re: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION**

Master File No. 07-5944 SC

MDL No. 1917

This Document Relates to:

*Sharp Elecs. Corp. v. Hitachi, Ltd.*, No. 13-cv-01173;

*Electrograph Systems, Inc. et al. v. Technicolor SA, et al.*, No. 13-cv-05724;

*Siegel v. Technicolor SA, et al.*, No. 13-cv-05261;

*Best Buy Co., Inc. v. Technicolor SA, et al.*, No. 13-cv-05264;

*Interbond Corporation of America v. Technicolor SA, et al.*, No. 13-cv-05727;

*Office Depot, Inc. v. Technicolor SA, et al.*, No. 13-cv-05726;

*Costco Wholesale Corporation v. Technicolor SA, et al.*, No. 13-cv-05723;

*P.C. Richard & Son Long Island Corporation, et al. v. Technicolor SA, et al.*, No. 13-cv-05725

*Schultze Agency Services, LLC, o/b/o Tweeter Opco, LLC, et al. v. Technicolor SA, Ltd., et al.*, No. 13-cv-05668;

*Sears, Roebuck and Co. and Kmart Corp. v. Technicolor SA*, No. 3:13-cv-05262;

*Target Corp. v. Technicolor SA, et al.*, No. 13-cv-05686;

*Tech Data Corp., et al. v. Hitachi, Ltd., et al.*, No. 13-cv-00157;

*Viewsonic Corp. v. Chunghwa Picture Tubes, Ltd.*, No. 14-cv-02510.

**DECLARATION OF BRIAN M. GILLET IN SUPPORT OF DIRECT ACTION PLAINTIFFS' ADMINISTRATIVE MOTION TO SEAL PORTIONS OF THEIR RESPONSE IN OPPOSITION TO MITSUBISHI ELECTRIC'S MOTIONS IN LIMINE NOS. 1-3**

The Honorable Samuel Conti

1 I, Brian M. Gillett hereby declare as follows:

2 1. I am attorney and counsel for plaintiff Alfred H. Siegel, solely in his capacity as  
3 Trustee of the Circuit City Stores, Inc. Liquidating Trust.

4 2. I submit this declaration in support of Direct Action Plaintiffs' Administrative Motion  
5 to Seal Portions of Their Response in Opposition to Mitsubishi Electric's Motions in Limine Nos. 1-3  
6 Pursuant to Civil Local Rules 7-11 and 79-5(d).

7 3. Portions of Direct Action Plaintiffs' Opposition contain excerpts from and/or  
8 statements derived from documents and testimony which have been designated "confidential" or  
9 "highly confidential" pursuant to the Stipulated Protective Order governing this litigation [D.E. 306,  
10 June 18, 2008] ("Stipulated Protective Order"). The confidential/highly confidential designations  
11 were made by certain defendants in this litigation. To qualify as confidential or highly confidential  
12 under the Stipulated Protective Order, information must contain trade secrets or other confidential  
13 research, development, or commercial information or private or commercially sensitive information.  
14 Stipulated Protective Order ¶ 1.

15 4. The Stipulated Protective Order requires that a party may not file any confidential  
16 material in the public record. Stipulated Protective Order ¶ 10. The Stipulated Protective Order  
17 further provides that any party seeking to file any confidential material under seal must comply with  
18 Civil Local Rule 79-5. Stipulated Protective Order at ¶¶ 1, 10.

19 5. The highlighted portions of Plaintiffs' Opposition contain such material. The following  
20 exhibits also contain material that certain defendants have designated as confidential or highly  
21 confidential and, pursuant to Local Rule 79-5(e), Plaintiffs seek to submit this material under seal in  
22 good faith in order to comply with the Stipulated Protective Order and the applicable Local Rules:  
23 Exhibit A, Exhibit B.  
24  
25  
26  
27  
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6. Therefore, Direct Action Plaintiffs respectfully request an order sealing portions of

I declare under penalty of perjury that the foregoing is true and correct.

ed on this 27th day of February, 2015 at Houston, Texas.

Brian M. Gillett